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April 4, 2025

**VIA ECF**

The Honorable Michael E. Farbiarz  
United States District Court Judge  
Frank R. Lautenberg Post Office and Courthouse  
2 Federal Square  
Newark, New Jersey 07102

**Re: Khalil v. Joyce, et al., Case No.: 2:25-cv-01963-MEF-MAH**

Dear Judge Farbiarz:

On behalf of the Petitioner in the above-referenced action, I write to respectfully request permission to file an overlength reply brief in further support of his Motion for Preliminary Injunctive Relief. The reply brief is due Sunday, April 6, 2025, by 10:00 a.m. (ECF 144).

Specifically, we seek to file an additional 7 pages of briefing in 14-point font, for a total of 22 pages so that Petitioner can adequately address the multiple jurisdictional arguments raised by the Government in its opposition. Counsel for the Government has consented to this request and has indicated that they would be submitting a request *nunc pro tunc* to file an overlength brief regarding ECF 156 (35 pages of 12-point font).

We thank the Court for its consideration of this request.

Respectfully submitted,

s/ Jeanne LoCicero  
Jeanne LoCicero  
ACLU of New Jersey Foundation

*Co-counsel for Petitioner*

cc: Counsel of Record via ECF